

ROBBINS GELLER RUDMAN  
& DOWD LLP  
RACHEL L. JENSEN  
ALEXANDRA S. BERNAY  
CARMEN A. MEDICI  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

Attorneys for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a Delaware Limited Liability Company, and MICHIGAN MULTI-KING, INC., a Michigan Corporation, on Behalf of Themselves and All Those Similarly Situated,	)	No. 2:08-cv-00235-CCC-JAD
	)	
	)	<u>CLASS ACTION</u>
	)	
	)	STIPULATION AND PROPOSED
	)	ORDER
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
THOSE CERTAIN UNDERWRITERS AT LLOYD'S, LONDON MEMBERS OF SYNDICATES, et al.	)	
	)	
Defendants.	)	
	)	

---

WHEREAS, the parties entered into the Stipulation of Partial Class Action Settlement on April 9, 2019 (“Stipulation”);

WHEREAS, the Stipulation was filed with the Court on April 19, 2019;

WHEREAS, the Court entered its Order Preliminarily Approving Proposed Partial Class Action Settlement and Preliminarily Certifying a Class for Settlement Purposes on May 3, 2019 (“Preliminary Approval Order”);

WHEREAS, ¶XIV.4. of the Stipulation provides that “within ten (10) days after entry of the Preliminary Approval Order, \$400,000 of the Settlement Amount will be wired by the Settling Defendants to the Claims Administrator (“Notice Credit”)”;

WHEREAS, the Settling Parties now wish to amend the above provision in the Stipulation (¶XIV.4.) to provide that the Notice Credit shall be paid to the Escrow Agent who shall deposit the Notice Credit into the Escrow Account and within two (2) business days of deposit therein, the Escrow Agent shall transfer the Notice Credit to the Claims Administrator.


NOW, THEREFORE, IT IS HEREBY STIPULATED that the Stipulation is amended as follows:

(A) The Notice Credit shall be paid by the Settling Defendant to the Escrow Agent to be deposited into the Escrow Account and within two (2) business days of such deposit, the Escrow Agent shall transfer the Notice Credit to the Claims Administrator; and

(B) If any funds which are part of the Notice Credit have already been transferred to the Claims Administrator, such funds shall be transferred by the Claims Administrator to the Escrow Agent for deposit into the Escrow Account. Within two (2) business days of transfer to the Escrow Agent and deposit into the Escrow Account, such funds shall be transferred to the Claims Administrator.

DATED: May 9, 2019

ROBBINS GELLER RUDMAN  
& DOWD LLP  
RACHEL L. JENSEN  
ALEXANDRA S. BERNAY  
CARMEN A. MEDICI

  
RACHEL L. JENSEN

655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

ZWERLING, SCHACHTER  
& ZWERLING, LLP  
ROBERT S. SCHACHTER  
DAN DRACHLER  
ANA M. CABASSA

  
ROBERT S. SCHACHTER

41 Madison Avenue  
New York, NY 10010  
Telephone: 212/223-3900  
212/371-5969 (fax)

Plaintiffs' Co-Lead Counsel

ROBINS KAPLAN LLP  
MATTHEW M. BURKE

Matthew M. Burke / Y.D.P.  
MATTHEW M. BURKE

Prudential Tower  
800 Boylston Street  
Boston, MA 02199  
Telephone: 617/859-2711  
617/267-8288 (fax)

Counsel for Certain Underwriters at  
Lloyd's, London Organized as  
Syndicates 0102, 0382, 0435 and 1886

HOLLAND & KNIGHT LLP  
JOHN M. TORIELLO  
DUVOL THOMPSON

John M. Toriello / Y.D.P.  
JOHN M. TORIELLO

31 West 52nd Street  
New York, New York 10019  
Telephone: 212/513-3200  
212/385-9010 (fax)

Certain Underwriters at Lloyd's, London  
Organized as Syndicates 0033, 0623,  
0958, 1183, 2001, 2623, and 2987

MESSNER REEVES LLP  
ABIGAIL NITKA



ABIGAIL NITKA

805 Third Avenue, 18th Floor  
New York, New York 10022  
Telephone: 646/663-1860  
646/663-1895 (fax)

Certain Underwriters at Lloyd's, London  
Organized as Syndicates 0570 and 0609

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE CLAIRE C. CECCHI  
UNITED STATES DISTRICT JUDGE